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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

***IN RE: MIDLAND CREDIT  
MANAGEMENT, INC.,  
TELEPHONE CONSUMER  
PROTECTION ACT  
LITIGATION***

) Case No. 11-md-2286-MMA  
(MDD)

) Member cases: 10-cv-02261  
) 10-cv-02600  
) 10-cv-02368  
) 10-cv-02370

**DECLARATION OF  
CHRISTOPHER ROBINSON  
IN SUPPORT OF MOTION  
FOR PRELIMINARY  
APPROVAL OF CLASS  
ACTION SETTLEMENT AND  
CERTIFICATION OF  
SETTLEMENT CLASS**

Hon. Michael M. Anello

Courtroom:

Date:

Time:

1 I, Christopher Robinson, declare:

- 2 1. I am the named Plaintiff in an action entitled *Robinson v. Midland Funding,*  
3 *LLC*, 10-cv-2261 MMA AJB, filed November 2, 2010, that was consolidated  
4 into the above captioned Multi-District Litigation class action against  
5 Midland Funding, LLC (“Midland Funding”) Midland Credit Management,  
6 Inc. (“MCM”) and Encore Capital Group, Inc. (“Encore”) (collectively  
7 referred to as “Defendants”). If called as a witness, I would competently  
8 testify to the matters herein from personal knowledge. I am filing this  
9 declaration in support of our request for the Preliminary Approval of the  
10 settlement.
- 11 2. In that class action, through my counsel, I alleged violation of Section  
12 227(b)(3)(B) of the Telephone Consumer Protection Act (“TCPA”), codified  
13 at 47 U.S.C. § 227 et seq. That Complaint alleged that Defendant Midland  
14 Funding, LLC violated the TCPA by robocalling my cellular telephone, or  
15 using an artificial or prerecorded voice, without my prior express consent,  
16 while attempting to collect a debt. My case was consolidated with the other  
17 Multi-District Litigation (“MDL”) cases for coordinated and consolidated  
18 proceedings in this MDL proceeding.
- 19 3. Plaintiffs have agreed to a class Settlement with Defendants. I have reviewed  
20 the Settlement Agreement and have discussed the settlement with my  
21 counsel. I believe the settlement is fair and reasonable. I request that the  
22 Court approve the settlement.
- 23 4. I am willing to serve as a Class Representative and desire to be appointed as  
24 such for purposes of the settlement. I understand the obligations as serving as  
25 class representative, have, and will adequately represented the interests of the  
26 putative class, and I have retained experienced counsel. I understand my  
27 tasks as a class representative and I have participated throughout this  
28 litigation in the belief I was helping all other persons similarly situated.
5. I understand that my attorneys have requested that the three class  
representatives be awarded incentive payments of up to a total of \$7,500, at

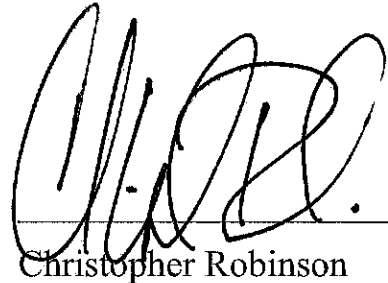
\$2,500 each, to be paid from the Settlement Fund. I understand that any such award has to be approved by the Court.

6. I also support my attorneys' request to confirm that interim co-lead counsel as appointed by this Court, the Law Offices of Douglas J. Campion, APC and Edelman, Combs, Lattner & Goodwin, LLC, be confirmed as Class Counsel to assist in this matter throughout the Final Approval process and completing the settlement process.
7. I am unaware of any legal differences in my status as a Class Member from the other Class Members, nor of any unique factual issues pertaining to such representative status which must be litigated. To my knowledge, I have no conflict with the other Class Members. The claims which I have asserted in the Complaint and the Consolidated Amended Complaint seem to be the same as the claims of the other class members, and my claims relate to the same issues of law and fact as the other class claims.
8. I understand the obligations as serving as class representative, and will continue to adequately represent the interests of the putative class, and I have retained experienced counsel.

I declare under penalty of perjury that the foregoing is true and correct.

Executed under the laws of the United States on

SEPTEMBER 24, 2015 at HENDERSON, <sup>NEVADA</sup> California.



Christopher Robinson